

U.S. DEPARTMENT OF THE INTERIOR,
OFFICE OF THE SECRETARY,
Washington, D.C., June 10, 1974.

HON. HENRY M. JACKSON,
*Chairman, Committee on Interior and Insular Affairs,
U.S. Senate, Washington, D.C.*

DEAR MR. CHAIRMAN: This responds to questions and issues concerning wilderness raised by members of the Public Lands Subcommittee during hearings held on March 19, 1974, and subsequently by committee staff.

The issues and our responses are as follows:

Question 1. Use of non-motorized patrol in wilderness areas.

Answer. The use of foot or horse patrol is in many cases a viable alternative to motorized patrol, which in all but the most exceptional instances we consider incompatible with wilderness status. However, at present there are very few areas where horse patrol is in effect; most of these are western refuges established for preservation of the buffalo. There are, moreover, certain problems with an immediate conversion to horse patrol in all situations. To keep horses in an area year-round would require the construction of such facilities as fences, barns, and corrals, the acquisition of stock, and the provision of food. All of these things take time, and for the present other means of patrol will be required in most areas.

In the specific case of Blackbeard Island, the small size of the refuge makes the use of horses for patrol all but impossible. However, we believe we can patrol the refuge from outside the proposed wilderness area, on stretches of beach which are not in refuge ownership—i.e., below the mean high-tide line during the turtle nesting season. We will also use boats to conduct patrols on waters outside the proposed wilderness area.

Question 2. The Department of the Interior's interpretation of Section 2(c) (4) as it relates to historical structures.

Answer. This section provides, in part, that wilderness areas may contain "ecological, geological, or other features of scientific, educational, scenic, or historical value". We interpret this language to mean that structures of historical value need not be carved out of wilderness areas. A recommendation to include such a structure in wilderness would be based on two criteria: (1) the structure should be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.

Question 3. Reasoning as to how submerged lands can be wilderness without the water above it being the same.

Answer. The dredging and filling of marine areas and the extraction of minerals from the ocean bottom can permanently alter the natural underwater environment. Thus, submerged lands are as susceptible to spoilation and as deserving of protection as emergent lands. Whenever conditions warrant, we include submerged lands in wilderness proposals.

It is difficult to establish a blanket rule for inclusion of water columns in wilderness. However, in many cases the decision is taken out of our hands because we do not own the water column. Thus, we do not believe there is any anomaly in our recommending wilderness status for submerged lands irrespective of activity that may be conducted in waters over them.

Question 4. The consistency of controlled burning with wilderness designation.

Answer. Burning is one of the few human activities which can duplicate nature. In primitive times fire was an integral part of the natural processes that shaped the landscape. It was as important in the natural scheme of things as were floods, droughts, hurricanes and tornadoes. In early times, fires spread over vast reaches of the country, often being extinguished only by extensive rainfall or the interposition of a natural barrier, such as a river.

With the advent of communities and the threat that fires pose to economic assets such as timber and cultivated crops burning became something to be controlled as soon as possible. Yet the disappearance of fires from some areas has worked an alteration in their natural state. In order to duplicate the environment which would prevail if nature were allowed to take its course, we believe that controlled burning in certain areas is essential. For example, without such burning in the Lostwood and Chase Lake Refuges, native expanses of prairie grass would be choked and replaced by brush. Nor do we believe that wilderness status is inconsistent with controlled burning. Where natural fires are so restricted by works of man that they cannot spread onto small wilderness areas, and where fire is, and always has been, an integral part of the environment of the areas, we believe that periodic, prescribed burning should be permitted and accepted as a part of wilderness management.

Question 5. Responses to questions on specific proposals.

Bosque del Apache

Answer. Attached is a revised map of the Bosque del Apache wilderness area which modifies the west boundary of the Little San Pascual Unit to follow the buried pipe line right-of-way on the north and south ends and an existing fence line in the center. We have no objection to this modification of the wilderness area.

Breton Lighthouse

Answer. The lighthouse on the northernmost point of the Chandler Islands was apparently constructed in the late 1800's. The lighthouse reservation was made on September 24, 1847, and as best we can determine construction took place prior to the turn of the century. We feel that the lighthouse qualifies as an historic structure and can properly be included in the wilderness area.

Simeonof

We neglected to address ourselves to the matter of aircraft and motorboat use of the water surface within the Simeonof National Wildlife Refuge. Since the proposal (section 5 of S. 600) speaks only of "lands", we do not interpret the waters surrounding the refuge to be part of the proposal. As manager of the wildlife refuge, we shall continue to permit use of the water surface by float planes and motorboats as necessary for administrative purposes, for the exercise of valid existing rights, and for public health and safety.

Question 6. Senator McClure later in the hearings (p. 83) asked what the State authority is for the maintenance of mosquito abatement within the Brigantine Refuge in New Jersey.

Answer. Special Use Permits are issued on an annual basis to the Atlantic County Mosquito Abatement District for control of mosquitoes. The permits cover the clearing of existing mosquito ditches (but do not permit creating new ditches or enlarging existing ditches); use of sprays to control mosquito population; and the establishment of light traps and dipping stations to determine mosquito population.

Question 7. In response to the request of the Chairman of the Subcommittee, a copy of the Department's wilderness guidelines is enclosed. We understand that the Forest Service has written a lengthy manual to guide its wilderness decisionmaking. Rather than hold up this transcript and the other answers to questions asked at the hearing, we respectfully suggest that the Committee may want to obtain this manual and compare the stances taken by the two Departments itself.

Wolf Island

Answer. The correct acreage figure for this proposal is 5,126.

Sincerely yours,

KEN M. BROWN,
Legislative Counsel.

Enclosure.

U.S. DEPARTMENT OF THE INTERIOR,
OFFICE OF THE SECRETARY,
Washington, D.C., June 24, 1972.

MEMORANDUM

To: Director, Bureau of Sport Fisheries and Wildlife
Director, National Park Service
From: Assistant Secretary for Fish and Wildlife and Parks
Subject: Guidelines for Wilderness Proposals—Reference Secretarial Order No. 2920

In the course of developing wilderness proposals we should strive to give the areas under study wilderness designation but not at the expense of losing the essential management prerogatives that are necessary to fulfill the purposes for which the areas were originally intended. Although each area under study must be considered separately, with special attention given to its unique characters, the following criteria should be adhered to when determining the suitability of an area for wilderness designation.